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19 San Francisco

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 In re Case No. 23-30564
20 THE ROMAN CATHOLIC ARCHBISHOP Chapter 11
OF SAN FRANCISCO,
21 Debtor and
22 Debtor in Possession.
23
24
25 **NOTICE OF HEARING ON DEBTOR'S
SECOND MOTION FOR ORDER
EXTENDING EXCLUSIVITY PERIODS [11
U.S.C § 1121(d)]**
Date: March 7, 2024
Time: 1:30 p.m.
Location: Via ZoomGov
Judge: Hon. Dennis Montali

27 **NOTICE IS HEREBY GIVEN** that The Roman Catholic Archbishop of San Francisco,
28 debtor and debtor-in-possession herein (“Debtor”), has filed a *Motion for Order Extending*

Case No. 23-30564

1 *Exclusivity Periods* [11 U.S.C. § 1121(d)] (the “Motion”) and that a hearing on the Motion is
2 scheduled before the Honorable Dennis Montali on March 7, 2024, at 1:30 p.m. at the United States
3 Bankruptcy Court, Northern District of California, San Francisco Division, before the Honorable
4 Dennis Montali (the “Hearing”). The Hearing will not be conducted in the presiding judge’s
5 courtroom but instead will be conducted by videoconference via ZoomGov. The Bankruptcy
6 Court’s website provides information regarding how to arrange an appearance at a video or
7 telephonic hearing. If you have questions about how to participate in a video or telephonic hearing,
8 you may contact the court by calling 888-821-7606 or by using the Live Chat feature on the
9 Bankruptcy Court’s website. The link to the judge’s electronic calendar is:
10 <https://www.canb.uscourts.gov/judge/montali/calendar>.

11 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of*
12 *Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [ECF
13 14], the *Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and Debtor’s Emergency*
14 *Motions* [ECF 15], and the additional *Declaration of Fr. Patrick Summerhays in support of this*
15 *Motion* and the pleadings and papers on file in this case, and such other evidence and argument as
16 may be submitted before or during the hearing on the Motion.

17 By the Motion, the Debtor seeks entry of an order pursuant to 11 U.S.C. §1121(d) extending
18 the exclusivity periods within which Debtor has the exclusive right to propose a plan (which
19 currently expires on March 21, 2024) and obtain acceptance of such a plan (which currently expires
20 on May 23, 2024), until June 25, 2024 (95 days), and August 26, 2024 (95 days), respectively. The
21 Debtor believes that the relief requested is necessary and appropriate given the early stage of the
22 case, the complexity of the case, the steady progress in the postpetition management of the case, and
23 the progress toward developing a process to facilitate a plan of reorganization. Further, the survivor
24 claims bar date has not yet passed and parties in interest have not yet participated in mediation. The
25 requested relief is without prejudice to: (a) Debtor’s right to seek further extensions and the rights
26 of parties in interest with standing to oppose such requests, and (b) the rights of parties in interest
27 with standing to seek to shorten or terminate Debtor’s exclusivity periods and Debtor’s right to
28 oppose such requests.

1 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
2 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
3 For further specifics concerning the Motion and the relief requested, you are encouraged to review
4 the Motion and the supporting evidence, including the supporting Declarations, copies of which
5 may be obtained from the website to be maintained by the Debtor's proposed Claims and Noticing
6 Agent, Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/RCASF>, free of charge. You
7 may also access these documents from the Court's Pacer system (requires a subscription). The web
8 page address for the United States Bankruptcy Court for the Northern District of California is
9 <http://www.canb.uscourts.gov>.

10 The Bankruptcy Court's website provides information regarding how to arrange a telephonic
11 or video appearance. Counsel, parties and other interested parties may attend the hearing in person
12 or by Zoom. Additional information is available on Judge Montali's Procedures page on the court's
13 website. Information on attending the hearing by Zoom will be provided on Judge Montali's
14 calendar posted on the court's website. The link to the judge's electronic calendar is:
15 <https://www.canb.uscourts.gov/judge/montali/calendar>.

16 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be
17 in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-
18 referenced addresses so as to be received by March 22, 2024. Any opposition or response must be
19 filed and served on the Limited Service List as provided in the Interim Order Approving Motion to
20 (1) Establish Notice Procedures, (2) File Confidential Information Under Seal, and (3) Temporarily
21 Suspend Deadline for Filing Proofs of Claim at ECF 38. The updated Limited Service List may be
22 obtained from the Omni website listed above. Failure to file timely opposition and appear at the
23 hearing may constitute a waiver of your objections. Your rights may be affected. You should read
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1 these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.
2 If you do not have an attorney, you may wish to consult one.

3 Dated: February 8, 2024

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

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5 By: /s/ Jason E. Rios
6 PAUL J. PASCUZZI
7 JASON E. RIOS
THOMAS R. PHINNEY

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9 Attorneys for The Roman Catholic Archbishop of
10 San Francisco

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12 Dated: February 8, 2024

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15 By: /s/ Ori Katz
16 ORI KATZ
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